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16 *Counsel for the Official Committee*
17 *of Unsecured Creditors*

18 **UNITED STATES BANKRUPTCY COURT**
19 **NORTHERN DISTRICT OF CALIFORNIA**
20 **SAN FRANCISCO DIVISION**

21 **In re:**

22 **PG&E CORPORATION**

23 **-and-**

24 **PACIFIC GAS AND ELECTRIC**
25 **COMPANY,**

26 **Debtors.**

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

- 27 ☐ Affects PG&E Corporation
28 ☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

* All papers shall be filed in the Lead Case,
No. 19-30088 (DM)

**DECLARATION OF THOMAS R.
KRELLER IN SUPPORT OF THE
STATEMENT OF THE OFFICIAL
COMMITTEE OF UNSECURED
CREDITORS IN SUPPORT OF DEBTORS'
MOTION FOR THE ESTABLISHMENT
OF WILDFIRE CLAIMS ESTIMATION
PROCEDURES**

Date: August 14, 2019
Time: 9:30 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 I, **THOMAS R. KRELLER**, being duly sworn, state the following under the penalty of
2 perjury:

3 1. I am an attorney admitted to practice in the State of California and I am a partner
4 in the Financial Restructuring Group of the firm Milbank LLP ("Milbank"), counsel to the
5 Official Committee of Unsecured Creditors of the above-captioned debtors and debtors in
6 possession (the "Official Committee"). Milbank maintains an office at, among other places,
7 2029 Century Park East, 33rd Floor, Los Angeles, California, 90067-3019. There are no
8 disciplinary proceedings pending against me.

9 2. I am duly authorized to make this declaration on behalf of Milbank in support of
10 the Official Committee's statement (the "Statement") in support of the *Debtors' Motion*
11 *Pursuant to 11 U.S.C. §§ 105(a) and 502(c) for the Establishment of Wildfire Claims Estimation*
12 *Procedures*, dated July 18, 2019.

13 3. For the Court's reference in its consideration of the Statement, attached hereto as
14 Exhibit A is a true and correct copy of the *Master Complaint – Individual Plaintiffs, California*
15 *North Bay Fire Cases*, JCCP No. 4955 (Cal. Super. Ct. March 12, 2018).

16 4. Attached hereto as Exhibit B is a true and correct copy of the *Master Complaint –*
17 *Subrogation Plaintiffs, California North Bay Fire Cases*, JCCP No. 4955 (Cal. Super. Ct. March
18 12, 2018).

19 5. Attached hereto as Exhibit C is a true and correct copy of the *Public Entity*
20 *Master Complaint, California North Bay Fire Cases*, JCCP No. 4955 (Cal. Super. Ct. March 12,
21 2018).

22 I declare under penalty of perjury that the foregoing is true and correct to the best of my
23 knowledge and belief.

24
25 Executed on August 7, 2019, Los Angeles, CA

26 /s/ Thomas R. Kreller
27 Thomas R. Kreller
28